

REMARKS

Claims 21-25, 27, 29-31, 33, and 35-42 are pending. Claims 1-20, 26, 28, 32, and 34 were previously canceled. The Office Action rejects Claims 21-25, 27, 29-31, 33, and 35-42 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 6,061,646 to Martino ("Martino") in view of U.S. Pat. No. 7,130,801 to Kitahara ("Kitahara"), and further in view of U.S. Pat. App. Pub. No. 2005/0114114 to Rudolph ("Rudolph").

Applicants appreciate the Examiner granting the telephonic interview of April 14, 2011, during which the Examiner and Applicant's undersigned representative reached agreement that the cited primary reference, Martino, does not teach "an instance in which multiple language packages are determined to be associated with the language selected for the first user interface," as recited in independent Claims 38-40. As noted in the Interview Summary filed by the Examiner and mailed on April 21, 2011, the Examiner has agreed to perform a new search. In light of the agreement reached with the Examiner and the subsequent remarks, Applicants respectfully submit that the rejection under § 103(a) is overcome, and the claims are in condition for allowance.

The Rejection of Independent Claims 38-40 under § 103(a) is Overcome

Independent Claim 38 is directed to an apparatus comprising at least one processor and at least one memory storing computer program code. The at least one memory and stored computer program code are configured, with the at least one processor, to cause the apparatus to at least determine a language selected for a first user interface. The at least one memory and stored computer program code are configured, with the at least one processor, to further cause the apparatus to determine, based at least in part on the language selected for the first user interface, one or more language packages associated with the language selected for the first user interface. The one or more language packages are determined from among a plurality of available language packages. Each of the plurality of language packages is associated with a plurality of languages. At least some of the plurality of languages are associated with more than one of the plurality of language packages. The at least one memory and stored computer program code are

configured, with the at least one processor, to additionally cause the apparatus, in an instance in which only one language package is determined to be associated with the language selected for the first user interface, to select the determined language package for use by a speech recognition system. The at least one memory and stored computer program code are configured, with the at least one processor, to also cause the apparatus, in an instance in which multiple language packages are determined to be associated with the language selected for the first user interface, to determine a language selected for a second user interface and select one of the determined language packages based on the language selected for the first user interface and the language selected for the second user interface for use by the speech recognition system. Independent Claims 39 and 40 are directed to a method and computer program product, respectively, and though each has its own respective scope, recite substantially similar features insofar as this discussion is concerned.

The Office Action alleges that the primary reference, Martino, teaches the feature “an instance in which multiple language packages are determined to be associated with the language selected for the first user interface.” As noted above, Applicants’ undersigned representative and the Examiner reached an agreement during the telephonic interview that Martino does not teach or suggest this feature, and the Examiner agreed to perform a new search. As such, Applicants respectfully submit that the rejection of the independent claims (Claims 38-40) is overcome.

As discussed with the Examiner during the telephonic interview, Applicants further submit that Martino cannot be combined with or modified by any other reference to arrive at the feature “an instance in which multiple language packages are determined to be associated with the language selected for the first user interface.” Accordingly, Applicants submit that should the Office not allow the claims after the Examiner performs a new search, Martino may not be relied on as a basis for any rejection of the independent claims, as any modification of Martino to determine that multiple language packages are determined to be associated with the language selected for the first user interface would render Martino inoperable for its intended purpose.

In this regard, Martino teaches that a language recognition dictionary (LRD) has enough words to provide recognition for 40 percent of each language. A device accepts an utterance as an input and the input is passed to each speech engine using the LRD to create a text unit from

the utterance for each language represented in the LRD. A language recognizer then counts the number of recognized words for each text unit and sums them to determine the language with the greatest summed hits. A single-language speech recognition dictionary (SRD) is then loaded for the language having the greatest summed hits. *See*, col. 9, line 54 – Col. 10, line 67 of Martino.

Accordingly, Martino teaches using a multi-language dictionary having 40 percent of the words in each language of the multi-language dictionary to recognize a language of an utterance and then load a single language dictionary for the recognized language.

Applicants submit that it would be clearly improper for the Office to combine any reference with Martino for the proposition that the combination teaches the features of:

in an instance in which multiple language packages are determined to be associated with the language selected for the first user interface:
determining a language selected for a second user interface; and
selecting, by the processor, one of the determined language packages based on the language selected for the first user interface and the language selected for the second user interface for use by the speech recognition system,

as recited in the independent claims. In this regard, as previously discussed, Martino clearly teaches identifying a *single* language – i.e., the language having the greatest summed number of hits for an input utterance. As such, in *no instance* would Martino result in a determination of *multiple* language packages to be associated with a selected language. Further, modifying Martino as such would render Martino inoperable for its intended purpose. Accordingly, combining Kitahara, or any other reference with Martino to arrive at the claimed features would be improper.

In view of the foregoing remarks and the agreement reached with the Examiner, Applicants respectfully submit that the independent claims are patentably distinct from the cited references, taken alone or in combination. Accordingly, the rejection is overcome. Applicants further respectfully submit that the independent claims are in condition for allowance.

The Rejection of the Dependent Claims is Overcome

Because each of the dependent claims includes each of the recitations of a respective independent base claim, Applicants further submit that the dependent claims are patentably

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distinguishable from the cited references, taken alone or in combination, for at least those reasons discussed above. Accordingly, applicants respectfully submit that the rejections of the dependent claims are overcome and the dependent claims are in condition for allowance.

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CONCLUSION

In view of the amended claims and remarks presented above, it is respectfully submitted that all of the present claims of the present application are in condition for immediate allowance. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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